

Appln. No.: 09/881,597  
Amendment dated January 3, 2006  
Reply to Office Action of November 2, 2005

#### REMARKS/ARGUMENTS

The Office Action of November 2, 2005, has been carefully reviewed and these remarks are responsive thereto. Claims 18, 25, and 32 have been amended to be in a more preferred form for appeal. Claim 28 is amended to correct a typographical error. Reconsideration and allowance of the instant application are respectfully requested.

Applicant initially notes that the Office Action fails to address claims 8-10. While the Office Action indicates in the Office Action Summary that claims 8-10 are rejected, the body of the Office Action fails to address claims 8-10 or provide any indication of how or why these claims are rejected. Upon full consideration of this response, if the rejections are maintained, a subsequent Office Action is kindly requested to allow Applicants a fair opportunity to address any rejection of these claims.

#### *Rejections Under 35 U.S.C. § 102*

Claims 1-6, 11-14, 17, 18, 20-26, 29-41, and 43-45 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Whitledge *et al* (U.S. Pat. No. 6,925,595, hereinafter Whitledge). Applicants respectfully traverse this rejection for at least the following reasons.

In order to reject a claim as anticipated under 35 U.S.C. §102, a single prior art reference must teach every aspect of the claimed invention. MPEP § 706.02. However, Whitledge does not teach or suggest every feature of claim 1, or any other independent claim. For example, claim 1 recites that “converting is based on annotation of the authored content with markup information corresponding to one or more device feature values.” Whitledge does not operate in this manner, nor suggest that a modification can be made to operate in this manner.

Whitledge indicates that modifications are made, not based on markup annotations of the authored content as claimed, but rather based on external information stored in a database. Col. 8, lines 5-10. The database stores conversion preferences, such as user-preferences, device-specific conversion preferences, or site-specific conversion preferences. Col. 8, lines 10-13. Upon receiving the originally requested document from a proxy server, the Whitledge system in step 32 converts the original requested electronic document into a converted electronic document *based on the conversion preferences obtained in step 26*, i.e., obtained by consulting the database

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to obtain conversion preferences. Col. 8, lines 21-25 (emphasis added). This is wholly dissimilar to the claimed method where converting is based on *annotation of the authored content with markup information* corresponding to one or more device feature values. Whitledge makes no mention whatsoever of annotating the authored content with any sort of markup information, much less markup information corresponding to one or more device feature values. Claim 1 and its respective dependent claims 2-6, 11-14, 17 are therefore allowable for at least this reason.

In addition, with respect to claim 8, as discussed above Whitledge does not convert by invoking said markup information, but rather converts based on the database information.

With respect to claim 9, Whitledge does not remove the markup information from said device independent content. Applicants take the opportunity to reiterate the above notation, that the Office Action fails to address claims 8-10.

With respect to claim 17, Whitledge does not provide markup information in the electronic document, much less an indication that the authored content has a bi-axially free form characteristic.

Applicants have amended claim 18 to clarify that the “device-independent content comprises *markup information providing information for displaying said authored content* in compliance with author intent *on a plurality of devices having different display characteristics*.” Thus, similar to claim 1, Whitledge does not teach or suggest markup information in the device-independent content. Instead, Whitledge relies on conversion information stored in a separate database, and claim 18 is allowable over Whitledge. Dependent claims 20-24 are allowable for at least the same reason.

Claim 25 has been similarly amended as claim 18, and is therefore allowable for similar reasons. Dependent claims 26-31 are allowable for at least the same reasons as claim 25.

In addition, with respect to claim 26, Whitledge does not teach or suggest converting by interpreting metatags embedded in the content. Instead, Whitledge converts based on information stored in a database, as discussed above.

With respect to claim 30, Whitledge does not teach or suggest annotating the content with meta-data to indicate the manner in which portions of the content should be represented on a

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plurality of different terminal devices, the terminal devices having mutually incompatible display characteristics. Instead, Whitledge stores such information in the database, as discussed above.

Claim 32 has been similarly amended as claim 18, and is therefore allowable for similar reasons. Dependent claims 33-41 and 43-49 are allowable for at least the same reasons as claim 32.

In addition, with respect to claim 43, Whitledge does not teach or suggest removing the markup annotations from the device-independent content.

***Rejections Under 35 U.S.C. § 103***

Claims 15, 27, 28, and 46-49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Whitledge in view of Rohrbaugh *et al.* (U.S. Publ. No. 2002/0091738, hereinafter Rohrbaugh).

Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Whitledge in view of Lo *et al.* (U.S. Pat. No. 6,523,040, hereinafter Lo).

These rejections are traversed, as neither Rohrbaugh nor Lo corrects the deficiencies of Whitledge for the respective rejected claims.

(Conclusion and signature block follow on next page)

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### **CONCLUSION**

All rejections having been addressed, applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the Examiner is requested to contact the undersigned at (202) 824-3153.

Respectfully submitted,

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Dated this 3rd day of Jan, 2006

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